

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

CITY OF DETROIT, MICHIGAN,

Chapter 9
Case No. 13-53846
Hon: Thomas J. Tucker

Debtor.

STIPULATION FOR WITHDRAWAL OF CLAIMS OF
CHARTER TOWNSHIP OF PLYMOUTH

The Charter Township of Plymouth (“Township” or “Claimant”) and the City of Detroit, Michigan (the “City”), by and through the undersigned, stipulate as follows in support of the entry of the Order Withdrawing the claims of the Charter Township of Plymouth (attached hereto as Exhibit 1).

1. On December 17, 2013, The Township filed its proof of claims, Claim Nos. 24, 25 and 26.
3. The Claimant hereby withdraws these claims in their entirety with prejudice.
4. Nothing in this Stipulation or the proposed order attached hereto as Exhibit 1 addresses any post-petition or post-confirmation claims which have arisen or may arise between the City and the Charter Township of Plymouth.

WHEREFORE, the parties respectfully request that the Court enter an order in the form attached hereto as Exhibit 1 withdrawing the claims.

Dated: July 23, 2015

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EXHIBIT 1: PROPOSED ORDER

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EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re: Chapter 9
CITY OF DETROIT, MICHIGAN, Case No. 13-53846
Hon: Thomas J. Tucker

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ORDER APPROVING STIPULATION FOR
WITHDRAWAL OF CLAIMS (CLAIM NOS 24, 25, and 26)
OF THE CHARTER TOWNSHIP OF PLYMOUTH

This matter having come before the Court on the Stipulation For Withdrawal of Claims of the Charter Township of Plymouth (the "Stipulation"); The Township having filed Claim Nos. 24, 25 and 26 (the "Claims") in the above-captioned bankruptcy case. The Township having agreed to withdraw said Claims with prejudice and the Court being other fully informed:

IT IS HEREBY ORDERED THAT:

1. Claims Nos. 24, 25 and 26 filed by the Charter Township of Plymouth are withdrawn in their entirety with prejudice.
2. The City's claims agent is hereby authorized to update the claims register to reflect the granted in this Order.
3. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.
4. Nothing in the Stipulation or this Order affects the rights of the City or The Charter Township of Plymouth with respect to any post-petition or post-confirmation claims which have arisen or may arise between the parties